

Dear Chairman Riddle,

My husband and I are organic dairy producers from central New York. We have been certified (NOFA-NY) since 2000, milk 75-80 cows and ship to Organic Valley. I am writing to let you know that I believe that the Pasture Requirement is the most important issue facing organic dairies at this time, and I want to express full support for the recent Livestock Committee Pasture Requirement recommendations. Strict enforcement of access to pasture as stated in the recommendations is necessary so that all organic dairy cows receive a yet to be determined, legally mandated portion of their total feed intake from pasture. This includes an allowance of only narrowly defined, short term ("temporary") exceptions to pasture. It borders on absurdity for producers to be able to use lactation as a "stage of production" to manipulate the rule and sidestep the pasture requirement. I urge the NOSB to recommend specific wording be added to the Rule to keep this type of abuse from continuing to occur.

I wholeheartedly support the additional recommendations of the Northeast Organic Dairy Producers Alliance, of which I'm sure you are aware. I would like to add one point to the ones you have already heard:

- o Climates, areas, or farms that cannot provide a minimum of 120 days of grazing should not be considered for organic dairy production.

Much as oranges won't grow if the climate is too cold, were cows left to roam in their natural state they would not be found in geographical areas that don't support grass. It follows, then, that dairies should not be located in such areas either.

In reference to the NODPA recommendations I would like to note that it is my opinion, based on personal experience, as well as consultation with university pasture experts, that the maximum stocking rate of 3 cows per acre is too high. We graze on some of the best "crop land" in the state and would be hard pushed to maintain that stocking rate other than during the spring flush. I feel that a maximum stocking rate of 1.5 cows per acre is much more realistic.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality.

Sincerely,

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